

# **EXHIBIT G**

**From:** Sooknanan, Sparkle L. <[ssooknanan@jonesday.com](mailto:ssooknanan@jonesday.com)>

**Date:** Tuesday, Mar 12, 2019, 2:39 PM

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**Subject:** RE: In re Commonwealth of Puerto Rico et al. (17-bk-3283) / In re Employees Retirement System of the Government of Puerto Rico (17-bk-3566)

Counsel,

I am writing in response to the Rule 30(b)(6) deposition notices served on March 7 to Andalusian Global Designated Activity Company and Mason Capital Master Fund, LP. The notices are grossly overbroad and burdensome. The itemization of the testimony sought goes on for two pages and comprises 23 different topics. Even a cursory review shows that most are irrelevant, argumentative or improper. Topics 1 and 3, for example, asks about the issuance of the ERS bonds when you well know that our clients bought the bonds years after their issues. Topics 5-10 and 19-21, ask for legal conclusions, inappropriate testimony for a lay witness. Topics 12 and 13 ask for testimony about years of communications with the Fiscal Agent, a matter of no clear relevance to this motion. Topic 14 asks for matters not within the witness' knowledge. Topics 15 to 18 are about the contentions made in the pleadings, again not a topic for a lay witness. Topics 22 and 23 are in conflict with provisions of Judge Swain's scheduling order.

To avoid motion practice, we would ask you to narrow the scope of the requests to reasonable boundaries. We are available to meet and confer with you at mutually convenient times.

Thank you,  
Sparkle

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**Subject:** In re Commonwealth of Puerto Rico et al. (17-bk-3283) / In re Employees Retirement System of the Government of Puerto Rico (17-bk-3566)

Counsel –

Attached please find individual and Rule 30(b)(6) notices of deposition.

We are sending these notices as required under the Court's current schedule for Movants' motion, but acknowledge that the parties have been in discussions concerning the schedule for that motion and that the noticed dates are likely to change following further discussions. As such, we are serving these notices without prejudice to supplementing or withdrawing those notices, and without prejudice to serving any additional notices or subpoenas for deposition, in accordance with any new schedule.

Thank you.

**Carl Mazurek**

Associate

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